

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Christopher Watson and Plaintiff,
Intellectus, LLC,

- against -

Riptide Worldwide, Inc. et Defendant.
al.

11 cv 0874 (PC)

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the

Southern and Eastern Districts of New York, I, Megan J. Muoio a member in good standing of
the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Anthony F. Vittoria
Firm Name: Ober Kaler
Address: 100 Light Street
City/State/Zip: Baltimore, Maryland 21202
Phone Number: (410) 685-1120
Fax Number: (410) 547-0699

Anthony F. Vittoria is a member in good standing of the Bar of the States of
Maryland, Virginia and the District of Columbia

There are no pending disciplinary proceeding against Anthony F. Vittoria
in any State or Federal court.

Dated: 4/21/2011

City, State: New York, New York

Respectfully submitted,

Sponsor's

SDNY Bar JM-6121

Firm Name: Allyn & Fortuna LLP

Address: 200 Madison Avenue, 5th Floor

City/State/Zip: New York, NY 10016

Phone Number: (212) 213-8844

Fax Number: (212) 213-3318

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

	X	
	:	
CHRISTOPHER WATSON and	:	
INTELLECTUS, LLC,	:	
	:	11-CV-0874 (PAC)
Plaintiffs,	:	
	:	AFFIDAVIT OF MEGAN
-against-	:	J. MUOIO IN SUPPORT OF
	:	MOTION TO ADMIT
RIPTIDE WORLDWIDE, INC. (f/k/a Shea	:	<u>COUNSEL <i>PRO HAC VICE</i></u>
Development Corp.), FRANCIS E. WILDE,	:	
TOMMY E. WHEELER, JOSEPH VITETTA,	:	
RICHARD CONNELLY and PHILIP E.	:	
LOEFFEL,	:	
	:	
Defendants.	:	
	X	

State of New York)
) ss:
County of New York)

MEGAN J. MUOIO, being duly sworn, hereby deposes and says as follows:

1. I am associated with Allyn & Fortuna, LLP, counsel for Plaintiffs Christopher Watson and Intellectus, LLC in the above captioned action. I am familiar with the proceedings in this case. I make this Affidavit based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Anthony F. Vittoria as counsel *pro hac vice* to represent Plaintiffs in this matter.

2. I am a member of good standing of the bar of the State of New York, and was admitted to practice law on January 26, 2005. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Anthony F. Vittoria since December 2010.

4. Mr. Vittoria is a principal of Ober Kaler in Baltimore, Maryland. He is a member in good standing of the Bar of the States of Maryland, Virginia and the District of Columbia. Mr. Vittoria's Certificates of Good Standing from Maryland, Virginia and the District of Columbia are annexed hereto as Exhibit A.

5. I have found Mr. Vittoria to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

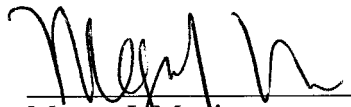
6. Accordingly, I am pleased to move the admission of Anthony F. Vittoria, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Anthony F. Vittoria, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE, it is respectfully requested that the motion to admit Anthony F. Vittoria, *pro hac vice*, to represent the Plaintiffs in the above captioned matter, be granted.

Dated: April 20, 2011
New York, New York

Respectfully submitted,



Megan J. Muoio
SNDY Bar Code: JM-6121

Sworn To Before Me This
20th day of April, 2011

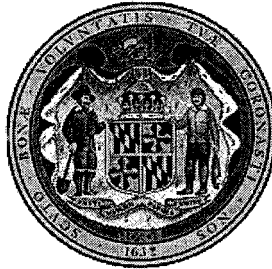


Notary Public

ANDREA PLATNER HELLMAN
Notary Public, State of New York
No. 02HE5068712
Qualified in New York County
Commission Expires Nov. 4, 2011

12/28/14

**Court of Appeals
of Maryland
Annapolis, MD**



CERTIFICATE OF GOOD STANDING

STATE OF MARYLAND, ss:

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,
do hereby certify that on the eighteenth day of December, 1997,*

Anthony Francis Vittoria

*having first taken and subscribed the oath prescribed by the Constitution and
Laws of this State, was admitted as an attorney of said Court, is now in good
standing, and as such is entitled to practice law in any of the Courts of said
State, subject to the Rules of Court.*

In Testimony Whereof, *I have hereunto
set my hand as Clerk, and affixed the Seal
of the Court of Appeals of Maryland, this
twelfth day of April, 2011.*

Bessie M. Decker

Clerk of the Court of Appeals of Maryland

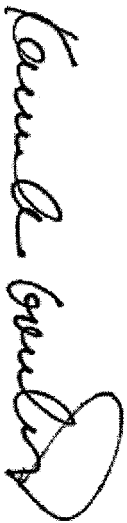


VIRGINIA STATE BAR

CERTIFICATE OF GOOD STANDING

THIS IS TO CERTIFY THAT ANTHONY FRANCIS VITTORIA IS AN ACTIVE MEMBER OF THE VIRGINIA STATE BAR IN GOOD STANDING. MR. VITTORIA WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON APRIL 23, 1997, AFTER SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.

Issued April 11, 2011


KAREN A. GOULD
EXECUTIVE DIRECTOR AND
CHIEF OPERATING OFFICER



District of Columbia Court of Appeals
Committee on Admissions
430 F Street, N.W. — Room 123
Washington, D. C. 20001
202 / 879-2710

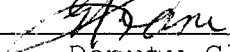
I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that

ANTHONY F. VITTORIA

was on the 7TH day of DECEMBER, 1998
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on April
14, 2011.

JULIO A. CASTILLO
Clerk of the Court

By: 
Deputy Clerk

SDNY Form Web 10/2006

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
 : SS :
COUNTY OF NEW YORK)

Anna Roman, being duly sworn, deposes and says:

On April 20, 2011, I served the annexed **MOTION TO ADMIT ANTHONY F. VITTORIA PRO HAC VICE** on the attorney(s) and/or parties named below by depositing a true copy in a postage-paid, properly addressed envelope into the care of the United States Postal Service at the postal box located at 200 Madison Avenue, New York, New York 10016. Postal service directed as follows:

Teresa M. Cinnamond, Esq.
Carroll, McNulty & Kull LLC
120 Mountain View Boulevard
Post Office Box 650
Basking Ridge, NJ 07920

Rick Castello, Esq.
Shaub, Ahmuty, Citrin & Spratt, LLP
655 Third Avenue
New York, NY 10017

Francis E. Wilde
316 Ridgehaven Place
Richardson, TX 75080


Tommy E. Wheeler
13846 Atlantic Blvd, #404
Jacksonville, FL 32225

Riptide Worldwide Inc.
c/o Shea Development Corp
1859 Whitney Mesa Drive
Henderson, NV 89014

Joseph E. Vitetta, Jr.
260 Ambleside Chase
Alpharetta, GA 30022

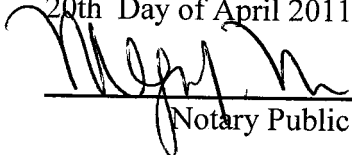
Such being the address previously designated for that purpose in the preceding papers in this action. Such service was done in full compliance with Rule FRCP 5(b). I am over 18 years old.

Dated: New York, New York
April 20, 2011



Anna Roman

Sworn To Before Me This
20th Day of April 2011



Notary Public

